

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
SUBREGION 17**

**INTERNATIONAL ASSOCIATION OF  
MACHINISTS AND AEROSPACE WORKERS,  
AFL-CIO, DISTRICT 70 AND LOCAL LODGE 839  
(Spirit Aerosystems)**

**Case 14-CB-133028**

**And**

**RYAN KASTENS, an Individual**

**And**

**SPIRIT AEROSYSTEMS**

**REQUEST FOR THE ISSUANCE OF  
HEARING SUBPOENA DUCES TECUM  
AND SUBPOENA AD TESTIFICANDUM**

Pursuant to Section 102.31 of the Board's Rules and Regulations, Counsel for the General Counsel hereby requests the issuance of subpoenas ad testificandum and duces tecum directing Becky Ledbetter to appear in the above matter before an Administrative Law Judge of the National Labor Relations Board on February 26, 2015, or any subsequent date, at 9:00 a.m. at **Wichita Federal Courthouse, Bankruptcy Courtroom, 401 N. Market, Wichita, Kansas**, and produce the documents described in the Attachment to this request.

<b>Person to be Served:</b>	Becky Ledbetter Assistant Directing Business Representative INTERNATIONAL ASSOCIATION OF MACHINISTS AND AEROSPACE WORKERS, DISTRICT LODGE 70 & LOCAL LODGE 839 3830 S Meridian Wichita, KS 67217
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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Werner', is written over a horizontal line.

Dated: February 22, 2015

Michael E. Werner  
Counsel for the General Counsel  
National Labor Relations Board  
Subregion 17  
8600 Farley Street, Suite 100  
Overland Park, Kansas 66212-4677

## ATTACHMENT

### DEFINITIONS AND INSTRUCTIONS

- a. **“Document”** means any existing printed, typewritten or otherwise recorded material of whatever character, records stored on computer or electronically, records kept on microfiche or written by hand or produced by hand and graphic material, including without limitation, checks, cancelled checks, computer hard drives, discs and/or files and all data contained therein, computer printouts, E-mail communications and records, any marginal or “post-it” or “sticky pad” comments appearing on or with documents, licenses, files, letters, facsimile transmissions, memoranda, telegrams, minutes, notes, contracts, agreements, transcripts, diaries, appointment books, reports, records, payroll records, books, lists, logs, worksheets, ledgers, summaries of records of telephone conversations, summaries of records of personal conversations, interviews, meetings, accountants’ or bookkeepers’ work papers, records of meetings or conference reports, drafts, work papers, calendars, interoffice communications, financial statements, inventories, news reports, periodicals, press releases, graphs, charts, advertisements, statements, affidavits, photographs, negatives, slides, disks, reels, microfilm, audio or video tapes and any duplicate copies of any such material in the possession of, control of, or available to the subpoenaed party, or any agent, representative or other person acting in cooperation with, in concert with or on behalf of the subpoenaed party.
- b. **“Respondent”** means International Association of Machinists and Aerospace Workers, AFL-CIO, District 70 and Local Lodge 839.
- c. **“Respondent’s facility”** means the facility located at 3830 S. Meridian, Wichita, Kansas 67217.
- d. **“Person” or “persons”** means natural persons, corporations, limited liability companies, partnerships, sole proprietorships, associations, organizations, trusts, joint ventures, groups of natural persons or other organizations, or any other kind of entity.
- e. **“Period covered by this subpoena”** means the period from January 26, 2014 through January 28, 2014, and the subpoena seeks only documents from that period unless another period is specified. This subpoena request is continuing in character and if additional responsive documents come to your attention after the date of production, such documents must be promptly produced.
- f. Any copies of documents that are different in any way from the original, such as by interlineation, receipt stamp, notation, or indication of copies sent or received, are considered original documents and must be produced separately from the originals.
- g. If any document covered by this subpoena contains codes or classifications, all documents explaining or defining the codes or classifications used in the document must also be produced.
- h. Electronically stored information should be produced in the form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

- i. All documents produced pursuant to this subpoena should be presented as they are kept in the usual course of business or organized by the subpoena paragraph to which the document or set of documents is responsive.
- j. This subpoena applies to documents in your possession, custody, or control.
- k. If a claim of privilege is made as to any document which is the subject of this subpoena, a claim of privilege must be expressly made and you must describe the nature of the withheld document, communication, or tangible thing in a manner that, without revealing information itself privileged or protected, will enable an assessment of the claim to be made.
- l. Unless otherwise stated, this subpoena does not supersede, revoke or cancel any other subpoena(s) previously issued in this proceeding.

### **DOCUMENTS TO BE PRODUCED**

- 1. During the period covered by this subpoena, documents that constitute, reflect, or memorialize all communications sent or received by Becky Ledbetter, including all electronic communications in their complete form, to or from the following: (1) employees of Spirit Aerosystems, Inc., including but not limited to Respondent's members and other bargaining unit employees; (2) Respondent's officers, business representatives, and staff; and (3) officers and staff of International Association of Machinists and Aerospace Workers Local Lodge 839.

**STATEMENT OF SERVICE**

I hereby certify that I have this date served copies of the foregoing **Request for the Issuance of Hearing Subpoena Duce Tecum and Subpoena Ad Testificandum** pursuant to the National Labor Relations Board's Rules and Regulations 102.114(i) by electronically filing with the Division of Judges with service by electronic mail on the parties identified below.

Dated: February 22, 2015

A handwritten signature in black ink, appearing to read 'MEW', is written over a horizontal line.

Michael E. Werner  
Counsel for the General Counsel

**Counsel for Respondent:**

Rod Tanner  
rtanner@rodtannerlaw.com

Matt Pierce  
mpierce@rodtannerlaw.com

**Charging Party**

Ryan Kastens  
ryankastens@gmail.com